

**BURSOR & FISHER, P.A.**  
Neal J. Deckant (State Bar No. 322946)  
1990 North California Blvd., 9th Floor  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-mail: ndeckant@bursor.com

**BURSOR & FISHER, P.A.**  
Victoria X. Zhou (*Pro Hac Vice*)  
1330 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
Telephone: (646) 837-7150  
Facsimile: (212) 989-9163  
E-Mail: [vzhou@bursor.com](mailto:vzhou@bursor.com)

*Attorneys for Plaintiff*

**DYNAMIS LLP**  
Brianna K. Pierce (State Bar No. 336906)  
100 Bayview Circle  
Newport Beach, CA 92660  
E-Mail: bpierce@dynamisllp.com

*Attorney for Defendant Kaizencure*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JWAL SHELAT, individually and on behalf of all others similarly situated,

Case No. 3:24-cv-04696-AMO

V

Plaintiff,

KAIZENCURE LLC D/B/A CRAFTORIA

Defendant.

**JOINT ADMINISTRATIVE MOTION  
REQUESTING REMOTE CASE  
MANAGEMENT CONFERENCE  
PURSUANT TO LOCAL RULE 7-11**

Date: Dec. 19, 2024  
Time: 10:00 am Pacific Time  
Courtroom: 10  
Judge: Araceli Martinez-Olguin

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that, pursuant to Section C.2 of Judge Martinez-Olguin’s Standing Order for Civil Cases (Rev. Nov. 22, 2023) and Civil Local Rule 7-11 of the United States District Court for the Northern District of California, Plaintiff Jwal Shelat (“Plaintiff”) and Defendant Kaizencure LLC (“Defendant” and collectively, the “Parties”) jointly submit this Administrative Motion to request remote appearances for the Initial Case Management Conference, set for December 19, 2024 at 10:00 am PT and currently to be held in person in Courtroom 10, Floor 19, 450 Golden Gate Ave., San Francisco, CA 94102. *See* ECF No. 9.

On August 2, 2024, Plaintiff filed the operative Complaint against Defendant. ECF No. 1. The case was later reassigned to Judge Araceli Martinez-Olguin on August 6, 2024. *See* ECF Nos. 7-9. That same day, the Court scheduled an Initial Case Management Conference before Judge Martinez-Olguin upon reassignment, setting the conference for Dec. 19, 2024 at 10:00am Pacific Time in San Francisco, Courtroom 10, 19th Floor. ECF No. 9.

Due to pre-existing caseloads and the impending holiday season, the Parties seek to appear remotely in the Initial Case Management Conference to preserve travel time and expenses. In addition and as encouraged by the Court's Individual Rules, holding the Initial Case Management Conference remotely would allow Plaintiff's more junior lawyers—including Victoria X. Zhou who is based in New York—more opportunities to participate in hearings before a court.

For the above reasons, the Parties jointly request that the Initial Case Management Conference scheduled on December 19, 2024 at 10:00 am be held remotely via videoconference.

Dated: December 5, 2024

**BURSOR & FISHER, P.A.**

By: /s/ Neal J. Deckant  
Neal J. Deckant

Neal J. Deckant (State Bar No. 322946)  
1990 North California Blvd., 9th Floor  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-mail: [ndeckant@bursor.com](mailto:ndeckant@bursor.com)

**BURSOR & FISHER, P.A.**  
Victoria X. Zhou (*Pro Hac Vice*)

1330 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
Telephone: (646) 837-7150  
Facsimile: (212) 989-9163  
E-Mail: [vzhou@bursor.com](mailto:vzhou@bursor.com)

*Attorneys for Plaintiff*

Dated: December 5, 2024

DYNAMIS LLP

By: /s/ Brianna K. Pierce

Brianna K. Pierce (State Bar No. 336906)  
100 Bayview Circle  
Newport Beach, CA 92660  
E-Mail: bpierce@dynamisllp.com

*Attorney for Defendant Kaizencure*

## **ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), the filer of this document attests that all signatories have concurred in its filing.

By: /s/ Neal J. Deckant